

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

UNITED STATES

V.

DOCKET NO. 13-CR-00062-JD-1

RONALD J. DESFOSSSES, JR.

ASSENTED TO MOTION TO CONTINUE

NOW COMES the accused, Ronald J. Desfosses, Jr., by and through counsel, and hereby move this Court to continue his March 4, 2014 Trial for 60 days.

In support of this Motion, the accused states as follows:

1. The accused is scheduled to appear in this Court for his Trial on March 4, 2014, at 9:30 a.m.;
2. Both parties thought the case would be resolved by a plea agreement. However, after repeated attempts to negotiate a deal, all negotiations broke down on February 19, 2014, and the defendant now wants to go to Trial;
3. The undersigned counsel has prepaid vacation plans from February 20, through March 2, 2014, and will not have sufficient time to prepare for this trial with only one day between March 2, return and the March 4, 2014, trial date;
4. Also, the undersigned counsel is scheduled for two trials to begin on March 31, 2014, at the Rockingham Superior Court, State v. Souther, and State v. Wallace and scheduled to last the entire week; and a trial to begin on April 7 at the Hillsborough Superior Court Northern District, State v. Alvarado;
5. The defendant is aware of this Motion.
6. In addition, the undersigned counsel has prepaid vacation plans out of the state of New Hampshire from April 24, through May 4, 2014;
7. That the U.S. Attorney's Office has no objection to this Motion to Continue Trial.

WHEREFORE, the accused respectfully requests that this Court grant this Assented to Motion to Continue Trial for 60 days.

Respectfully submitted
Ronald J. Desfosses, Jr.,
By his Attorney,

Date: February 19, 2014

/s/Paul J. Garrity
Paul J. Garrity
Bar No. 905
14 Londonderry Road
Londonderry, NH 03053
603-434-4106

CERTIFICATE OF SERVICE

I, Paul J. Garrity, herein certify that on this 19th day of February, 2014 a copy of the within Assented to Motion to Continue was emailed to all parties of record, including the U.S. Attorney's Office and mailed, postage prepaid, to Ronald J. Desfosses.

/s/ Paul J. Garrity
Paul J. Garrity